

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO SALES TAX FINANCING
CORPORATION,

Debtor.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

PROMESA

Title III

No. 17 BK 3284-LTS

**INFORMATIVE MOTION OF THE GMS GROUP, LLC REGARDING PROCEDURES
FOR ATTENDANCE, PARTICIPATION AND OBSERVATION OF JANUARY 16-17,
2019 HEARING ON CONFIRMATION OF PLAN OF ADJUSTMENT OF PUERTO
RICO SALES TAX FINANCING CORPORATION**

GODREAU & GONZALEZ LAW, LLC

Rafael A. González Valiente

P.O. Box 9024176

San Juan, PR 00902-4176

787.726.0077 (office)

787.360.0787 (cell)

rgv@g-glawpr.com

PERKINS COIE LLP

Gary F. Eisenberg (pro hac vice application pending)
30 Rockefeller Plaza, 22nd Floor
New York, NY 10112
Telephone: (212) 262-6902
Facsimile: (212) 977-1632
Email: geisenberg@perkinscoie.com

Attorneys for The GMS Group, LLC

Dated: January 7, 2019

The GMS Group, LLC (“GMS” or “Secured Creditor”), respectfully shows the Court as follows:

1. The undersigned counsel, Gary Eisenberg and Rafael A. Gonzalez Valiente (collectively, “Counsel”), will appear and speak on behalf of the GMS Group, LLC at the January 16-17, 2019 hearing and present argument regarding:

- (a) “Commonwealth of Puerto Rico’s Motion Pursuant to Bankruptcy Rule 9019 for Order Approving Settlement between Commonwealth of Puerto Rico and Puerto Rico Sales Tax Financing Corporation (the “Settlement”)¹. *See, Docket 4067;*
- (b) “Second Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation” (the “Second Plan of Adjustment”). *See, Docket 4363 (or 380 in Case No. 17-3284);*
- (c) “Amended Objection of the GMS Group, LLC to Second Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation and Request for Evidentiary Hearing” with supporting exhibits (the “GMS Objection”). *See, Docket 4564;*

¹ Although GMS Group did not file an Objection to the approval of the Settlement itself, GMS Group understands that the Second Plan of Adjustment is based on the Settlement. Moreover, GMS Group’s Objection to the Second Plan of Adjustment is mainly an Objection to the terms imposed by the Settlement which are incorporated into the Second Plan of Adjustment. Thus, GMS Group’s Objection to the Plan of Adjustment is should be considered as an Objection to the Settlement.

- (d) "Objection of Individual COFINA Subordinate Bondholder Residing in the 50 States Who Purchased at the Original Offering Prices, to Confirmation of Puerto Rico Sales Tax Financing Corporation ("COFINA") Plan, And Response And Opposition to COFINA's Thirteenth Omnibus Objection to Individual Claim No. 10701" (the "Hein Objection"). *See, Docket 4585;*
- (e) "GMS Group Joinder to the Hein Objection". *See, Docket 4587;*
- (f) "Supplement to the Objection Of Individual COFINA Subordinate Bondholder Residing In The 50 States Who Purchased At The Original Offering Prices, To Confirmation Of Puerto Rico Sales Tax Financing Corporation ("COFINA") Plan, And Response And Opposition To COFINA's Thirteenth Omnibus Objection To Individual Claim No. 10701" *See, Docket 4595;*
- (g) "GMS Group, LLC Joinder to Hein Supplement". *See, Docket 4605;*
- (h) "GMS Group, LLC Motion Submitting Declarations from Timothy Donohue and Peter Hein in Support of the GMS Objection and the Peter Hein Objection. *See, Docket 4606;*
- (i) "GMS Group, LLC Motion Submitting Declaration of Timothy Donohue Updating the Amount of Bonds Held by GMS Group, LLC. *See Docket 4641;*
- (j) "Informative Motion filed by the GMS Group, LLC Submitting Translations of Exhibits to Timothy Donohue Declaration'. *See, Docket 4162;*
- (k) Any additional Objections to the Third Plan of Adjustment and the Settlement;
- (l) Any Replies to any Objections to the Third Plan of Adjustment and the Settlement.

2. Counsel will appear in person in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

3. The GMS Group, LLC also reserves the right to respond to any statements made by any party in connection with the above-captioned jointly administered Title III cases.

Dated: New York, New York

January 7, 2019

GODREAU & GONZALEZ LAW, LLC

By: /s/ Rafael A. González Valiente
Rafael A. González Valiente
P.O. Box 9024176
San Juan, PR 00902-4176
787.726.0077 (office)
787.360.0787 (cell)
rgv@g-glawpr.com

PERKINS COIE LLP

By: /s/ Gary F. Eisenberg
Gary F. Eisenberg
30 Rockefeller Plaza, 22nd Floor
New York, NY 10112
Ph. 212-262-6900
Email: geisenberg@perkinscoie.com